

Exhibit 1

James Judah

From: Chang, Esther Kim <echang@mofo.com>
Sent: Thursday, June 01, 2017 12:20 PM
To: Walsh, Rachel M.; James Judah; UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit@bsflp.com; Chatterjee, Neel; Schuman, Brett; Brun, Shane; John Cooper; MCate@fbm.com
Cc: QE-Waymo
Subject: RE: Waymo v Uber - Normal Discovery Requests for Production

Uber and Ottomotto also agree with the deadlines below, as revised.

Esther
 Tel: (415) 268-7562

From: Walsh, Rachel M. [mailto:RWalsh@goodwinlaw.com]
Sent: Thursday, June 01, 2017 8:36 AM
To: James Judah; Chang, Esther Kim; UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit@bsflp.com; Chatterjee, Neel; Schuman, Brett; Brun, Shane; John Cooper; MCate@fbm.com
Cc: QE-Waymo
Subject: RE: Waymo v Uber - Normal Discovery Requests for Production

- External Email -

James,

Agreed with Esther's changes.

Rachel

From: James Judah [mailto:jamesjudah@quinnemanuel.com]
Sent: Wednesday, May 31, 2017 10:44 PM
To: Chang, Esther Kim; UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit@bsflp.com; Chatterjee, Neel; Schuman, Brett; Brun, Shane; Walsh, Rachel M.; John Cooper; MCate@fbm.com
Cc: QE-Waymo
Subject: Re: Waymo v Uber - Normal Discovery Requests for Production

Esther -

That's correct. A revised chart is below.

Requests for Production	Response Date	Calculation
First Set	June 23	30 days after May 26, less the two days between date of service (May 9) and the date of the stay (May 11)
Second Set	June 26	30 days after May 26, adding one day so that the response date falls on a Monday, with no

		modification based on date of service (May 11)
Third Set	June 30	30 days after date of service (May 31)

Best,
James

From: Chang, Esther Kim <echang@mofo.com>

Sent: Wednesday, May 31, 2017 9:52 PM

To: James Judah; UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit@bsflp.com; nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com; John Cooper; MCate@fbm.com

Cc: QE-Waymo

Subject: RE: Waymo v Uber - Normal Discovery Requests for Production

James,

We will review your proposed deadlines and get back to you. One clarification: Using the logic in the "Calculation" column for the First Set, I get a date of June 23. Would you please confirm that it should be June 23 (and not June 22)?

Esther

Tel: (415) 268-7562

From: James Judah [<mailto:jamesjudah@quinnemanuel.com>]

Sent: Wednesday, May 31, 2017 8:45 PM

To: UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit@bsflp.com; nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com; John Cooper; MCate@fbm.com

Cc: QE-Waymo

Subject: RE: Waymo v Uber - Normal Discovery Requests for Production

- External Email -

Re-sending with the correct cc email alias.

From: James Judah

Sent: Wednesday, May 31, 2017 8:43 PM

To: UberWaymo@mofo.com; BSF_EXTERNAL_UberWaymoLit@bsflp.com; nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com; John Cooper <JCooper@fbm.com>; MCate@fbm.com

Cc: QE-DSC <QE-DSC@quinnemanuel.com>

Subject: Waymo v Uber - Normal Discovery Requests for Production

Counsel and John –

Waymo served its remaining expedited requests for production on Friday, May 26. Accordingly, it has exhausted this category of expedited discovery and may proceed with normal discovery. Please confirm that, now that the stay for normal requests for production has been lifted, Defendants will respond to Waymo's First, Second, and Third Sets of Requests for Production (non-expedited) pursuant to the below schedule:

Set of Requests for Production	Response Date	Calculation
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First Set	June 22	30 days after May 26, less the two days between date of service (May 9) and the date of the stay (May 11)
Second Set	June 26	30 days after May 26, adding two days so that the response date falls on a Monday, with no modification based on date of service (May 11)
Third Set	June 30	30 days after date of service (May 31)

To the extent Defendants do not so agree, we request that this issue be added to tomorrow morning's call with the Special Master.

Best,
James

James Judah
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

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